UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF WASHINGTON

KATHERINE WRIGHT, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

KELLY SERVICES, INC., a foreign profit corporation doing business as KELLY SERVICES; KELLY SERVICES GLOBAL, LLC, a foreign limited liability company; KELLY SERVICES USA, LLC, a foreign limited liability company; and DOES 1-20,

Defendants.

Case No. 2:24-cv-01532-RSL

JOINT STIPULATED MOTION AND ORDER TO EXTEND DEFENDANTS' TIME TO RESPOND TO PLAINTIFFS' COMPLAINT AND PLAINTIFF'S DEADLINE TO FILE MOTION TO REMAND

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiff Katherine Wright ("Plaintiff"), by and through her counsel of record, and Defendants Kelly Services, Inc., Kelly Services Global, LLC, and Kelly Services USA, LLC, ("Defendants"), by and through their counsel of record, hereby stipulate, agree and request that this Court order an extension of time for Defendants to respond to Plaintiff's complaint and, further, to extend the deadline for Plaintiff to file a motion to remand, if any. In support of this joint motion, Plaintiff and Defendants state as follows:

- 1. Plaintiff filed her complaint on August 23, 2024, in Washington State Superior Court for King County.
- 2. Plaintiff served a copy of her complaint on Defendants on August 28, 2024, which set September 16, 2024 as Defendants' state court deadline to respond to Plaintiff's complaint.
 - 3. Before removing, the parties agreed to extend Defendants' deadline to respond to

Plaintiff's complaint to October 16, 2024.

- 4. Defendant removed this matter to this Court on September 25, 2024. (ECF No. 1.)
- 5. As a result of removal, and pursuant to Federal Rules of Civil Procedure Rule 81(c)(2)(C), Defendants' response to Plaintiff's complaint is currently due October 2, 2024. In addition, Plaintiff's deadline to file a motion to remand is due October 25, 2024.
- 6. Plaintiff and Defendants agree that Defendants should be provided up to and including October 23, 2024 to respond to Plaintiff's complaint and, accordingly, request that this Court enter an order extending to October 23, 2024, Defendants' deadline to respond to Plaintiff's complaint. In addition, Plaintiff and Defendants agree and request that this Court enter an order providing that Plaintiff shall have until November 6, 2024 to file a motion to remand, if any.
- 7. Plaintiff and Defendants agree that good cause supports this request. The short requested extensions to respond to Plaintiff's complaint and for Plaintiff to file a motion to remand, if any, will not materially impact this matter, but will instead allow Plaintiff and Defendants time to obtain documents and information necessary to respond to Plaintiff's complaint and analyze the issues in this case and allow for cost-effective and efficient use of the parties' and this Court's resources.
- 8. The parties, therefore, request that the Court enter an order extending Defendants' response deadline to October 16, 2024 and extending Plaintiff's deadline to file a motion to remand, if any, to November 6, 2024.
- 9. This is the first request for extension of time. No other dates or deadlines would be altered by this proposed extension of time. The parties do not anticipate moving for further

extensions of the aforementioned deadlines.

RESPECTFULLY SUBMITTED this 1st day of October 2024.

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ORDER

Based on the foregoing stipulation of the parties and GOOD CAUSE APPEARING, IT IS SO ORDERED that the case deadlines are amended as follows:

	Current Deadline	New Deadline
Defendants' Deadline to Respond to Plaintiff's Complaint	October 2, 2024	October 23, 2024
Plaintiff's Deadline to File Motion to Remand	October 25, 2024	November 6, 2024

Dated this 2nd day of October, 2024.

MMS (aswik Robert S. Lasnik

United States District Judge